

# Exhibit “7”

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RUBY FREEMAN and WANDREA' MOSS

No. 24-cv-6563(LJL)

Plaintiffs,

No. 24-mc-353(LJL)

-against-

RUDOLPH W. GIULIANI

Defendants' Second Amended  
Response to Plaintiffs' First Set of  
Interrogatories

Defendant.

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Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure and Local Rule 33.3 of the Southern District of New York, Defendant Rudolph W. Giuliani submit the Second Amended Responses to Plaintiffs' First Set of Interrogatories.

**SECOND AMENDED RESPONSES TO INTERROGATORIES**

**INTERROGATORY NO. 4:** Identify any financial, medical, or legal professional or firm whom you have consulted during the period of January 1, 2020, through the present.

**SECOND AMENDED RESPONSE:** It would be impossible for me to answer this interrogatory as I am unable to identify all of the financial, medical, or legal professionals or firms whom I have consulted with during the most stressful time of my life, which was during the period of January 1, 2020, through the present who I have consulted with during the preceding five years. I have attorney-client privileges, doctor-patient privileges which I do not waive. The question of who I consulted with in 2020 and thereafter is abusive. I have attorney-client privileges of attorneys that I consulted with on behalf of former clients of mine which I have no ability to waive. This is just one example of the abusive discovery carried out by

**Plaintiffs' counsel throughout for which they have not yet been held accountable.**

**INTERROGATORY NO. 8:** Identify all email accounts, messaging accounts, and phone numbers that You have used during the period January 1, 2023, through the present.

**SECOND AMENDED RESPONSE:**

**Email: TruthandJustice4U@protonmail.com**

**Messaging accounts: I do not understand what Messaging account is nor is it proper to ask for every messaging accounts.**

**Telephone numbers: The telephone number of the former Mayor of the City of New York and former United States Attorney who had death threats should remain undisclosed. There is no valid reason for the disclosure of the Defendant's confidential telephone number as it will not prove or disprove the fact that at all relevant times, the Defendant is and was a citizen of, a resident of and a domiciliary of the State of Florida prior to the filing of the Judgment in the United States District Court for the Southern District of New York which was filed on August 5, 2024.**

Dated: December 17, 2024  
Staten Island, New York

s/ joseph m. cammarata/

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RUBY FREEMAN and WANDREA' MOSS

No. 24-cv-6563(LJL)

Plaintiffs,

-against-

Defendants' verification of  
Defendant's response to Plaintiffs'  
First Set of Interrogatories

RUDOLPH W. GIULIANI

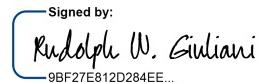
Defendant.

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Verification

Rudolph W. Giuliani hereby declares under penalties of perjury that the facts stated in the foregoing Defendant's Second Amended Responses to Plaintiffs' First Set of Interrogatories are true and correct to the best of my knowledge, information and belief.

Dated: December 17, 2024

Signed by:  
  
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Rudolph W. Giuliani